

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

IVAN POTTS,

*

Plaintiff,

*

v.

*

EVODIO C. HENDRIX, *et al.*,

*

Defendants/Cross Defendants,

*

o0o

Civil No.: 16-cv-03187-TDC

BALTIMORE POLICE DEPARTMENT,*

Defendant/Cross-Plaintiff,

*

v.

*

EVODIO C. HENDRIX, *et al.*,

*

Defendants/Cross-Defendants.

*

* * * * * **o0o** * * * * *

JOINT MOTION TO MODIFY SCHEDULING ORDER

The parties, by their counsel, respectfully move the Court to modify the scheduling order in accord with the proposed new deadlines set out below. In support of this motion, the parties state as follows:

1. Discovery is ongoing but the parties need additional time to complete the process. Counsel for the parties have conferred several times regarding the scope of discovery and are continuing to cooperate to complete the necessary tasks.

2. Counsel for the parties are engaged in productive discussions regarding the most efficient way to address substantive legal issues, and are making progress toward an agreement.

3. The parties have made two prior requests for modification of the scheduling order, which the Court granted on September 21, 2018 (ECF No. 72) and December 18, 2018 (ECF No. 86).

4. This joint motion is not made for any improper purpose or delay.

5. Below please find the original and new proposed deadlines.

<u>Task</u>	<u>Current Date</u>	<u>Proposed Date</u>
Motion to Amend the Pleadings for Joinder Of Additional Parties	February 27, 2019	May 27, 2019
Plaintiff's 26(a)(2) Expert Disclosures	March 13, 2019	June 13, 2019
Defendant's 26(a)(2) Expert Disclosures	April 10, 2019	July 10, 2019
Rule 26(e)(2) Supplementation of Disclosure Responses	May 1, 2019	August 1, 2019
Completion of Discovery	May 28, 2019	August 28, 2019
Requests for Admissions	June 3, 2019	September 3, 2019
Notice of Intent to File a Pretrial Dispositive Motion, see Case Management Order Part II.A	June 10, 2019	September 10, 2019

Wherefore, for the reasons stated herein, the parties move that the Court grant their motion, and for such other relief as is just and proper.

Respectfully submitted,

/s/

Andre M. Davis (362)
City Solicitor

Justin S. Conroy (28480)
Kara K. Lynch (29351)
Alexa E. Curley (19943)
Baltimore City Department of Law
Office of Legal Affairs
City Hall, Room 101
100 N. Holliday Street
Baltimore, MD 21202
410-396-2496 (telephone)
410-396-2126 (facsimile)
Justin.Conroy@baltimorecity.gov

/s/

Paul H. Zukerberg (10081)
Zuckerberg & Halperin, P.C.
1790 Lanier Place N.W.
Washington, D.C. 20009-2118
202-232-6400 (telephone)
paul@zuckerberg.com

/s/

Neil E. Duke (14073)
Baker Donelson
100 Light Street
Baltimore, MD 21202

/s/

Christopher C. Jeffries (28587)
Kramon & Graham PA
One South Street, Suite 2600
Baltimore, MD 21202

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of February 2019, a copy of the foregoing Joint Motion to Modify Scheduling Order, were filed with the United States District Court for the District of Maryland by electronic filing. All counsel of record being served via the Court's electronic filing system.

/s/
Justin S. Conroy (28480)